

June 7, 2006

Mary Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, Mass. 02110

RE: Bay State Gas, DTE 06-31

Dear Secretary Cottrell:

I am writing on behalf of my client, the United Steelworkers ("Union"), in response to the schedule proposed by Attorney Harak at the procedural conference held June 2, 2006 in the above referenced matter. Due to pre-existing litigation and personal commitments this summer, the Union requests the following schedule:

- 1) Notice of witnesses before or by: Friday, June 30;
  - 2) Deadline for intervenor discovery: Friday, July 28;
  - 3) All Company responses be provided within 10 working days and that the Company provide all written responses no later than Friday, August 18;
  - 4) Hearings to take place during September, excluding the following dates:
    - a. September 14
    - b. September 18
    - c. September 22
- 4) Initial Briefs be due by October 13, with replies due on or around October 23-26

Thank you for your attention to this matter.

Very truly yours,

Nicole Horberg Decter

NHD:cf  
Enclosure

cc: service list